

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**RONAIL BROWN, FREDERICK)
DAVIS, JR., ERIC VICKERS, and)
JAMEZ WILLIAMS,)**

Plaintiff's,)

v.)

CASE NO. 2:06cv261-WHA

BESTWAY RENTALS, INC.)

Defendant.)

REPORT OF THE PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on April 24, 2006 via telephone conference and was attended by:

Maricia Woodham, Esq.

One of the Attorneys for Plaintiffs Ronail Brown, Frederick Davis, Jr., Eric Vickers, and Jamez Williams; and

Robert F. Friedman, Esq. and John W. Sheffield, Esq.

Attorneys for Defendant Bestway Rentals, Inc.

2. **Pre-Discovery Disclosures**: The parties will exchange by May 23, 2006 the information required by Fed. R. Civ. P. 26(a)(1).

3. **Discovery Plan**: The parties jointly propose to the Court the following discovery plan:

(a) **Topics:** Discovery will be needed on the following subjects: allegations of the Plaintiff's Complaint, alleged damages and Defendant's defenses.

(b) **Discovery Deadline:** All discovery commenced in time to be completed by February 27, 2007.

(c) **Interrogatories:** Plaintiffs shall have a total of 45 Interrogatories for all Plaintiffs to Defendant. Defendant shall have 25 Interrogatories per Plaintiff. Responses to all interrogatories due 30 days after service.

(d) **Requests for Admission:** Plaintiffs shall have a total of 25 requests for admission for all Plaintiffs to Defendant. Defendant shall have a maximum of 15 requests for admission per Plaintiff. Responses to all requests due 30 days after service.

(e) **Requests for Production:** Plaintiff shall have a total of 45 requests for production for all Plaintiffs to Defendant. Defendant shall have a maximum of 30 requests for production per Plaintiff. Responses to all requests due 30 days after service.

(f) **Depositions:** Maximum of 10 depositions by the Plaintiffs and 10 depositions by the Defendant. Each deposition is limited to a maximum of 7 hours unless extended by agreement of the parties.

(g) **Supplementation:** Supplementation under Rule 26(e) due within 30 days of knowledge of the need to supplement but not later than 30 days before the completion of discovery.

(h) **Expert Testimony:** Unless modified by stipulation of the parties, the disclosure of expert witnesses including a complete report under Fed. R. Civ. P. 26(a)(2)(B) from any specially retained or employed expert are due:

From the Plaintiff by: October 16, 2006

From the Defendant by: December 1, 2006

4. **Other Items:**

(a) **Scheduling Conference:** The parties do not request a Scheduling Conference prior to the entry of the Scheduling Order.

(b) **Pretrial Conference:** The parties request a pretrial conference on June 7, 2007.

(c) **Pleadings and Parties:** Plaintiff should be allowed until May 24, 2006 to join additional parties and May 24, 2006 to amend the pleadings.

Defendant should be allowed until June 23, 2006 to join additional parties and June 23, 2006 to amend the pleadings.

(d) **Dispositive Motions:** All potentially dispositive motions must be filed by November 30, 2006.

(e) **Settlement:** Settlement cannot be evaluated prior to the parties conducting some discovery and may be enhanced by the use of mediation at a later date.

(f) **Final Lists:** Final lists of witnesses and exhibits under Rule 26(a)(3) should be due thirty (30) days before trial. Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

(g) **Trial:** The case should be ready for trial on July 9, 2007.

s/Maricia Woodham
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